

**Fill in this information to identify the case:**

Debtor 1 Andre Harris

Debtor 2  
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA

Case number 19-15608 MDC

**Form 4100R**

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

**Name of Creditor:** U.S. Bank N.A., as trustee, on behalf of the holders, of the J.P. Morgan Mortgage Acquisition Trust 2006-WMC4 Asset Backed Pass-Through Certificates, Series 2006-WMC4 **Court claim no. (if known):** 7-2

**Last 4 digits** of any number you use to identify the debtor's account: 0542

**Property address:**  
5912 Lansdowne Avenue  
Philadelphia, PA 19151

**Part 2: Prepetition Default Payments**

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- |  |       |                    |
|--|-------|--------------------|
| a. Total postpetition ongoing payments due:                      | (a)   | \$ <u>2,762.51</u> |
| b. Total fees, charges, expenses, escrow, and costs outstanding: | + (b) | \$ <u>0.00</u>     |
| c. <b>Total.</b> Add lines a and b.                              | (c)   | \$ <u>2,762.51</u> |

Creditor asserts that the debtor(s) are contractually obligated for 01 / 01 / 2023 the postpetition payment(s) that first became due on:

Debtor(s) Andre Harris  
First Name Middle Name Last Name

Case Number (if known): 19-15608 MDC

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box::*

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

✕/s/ Mark A. Cronin  
Mark Cronin  
14 Jun 2023, 11:27:43, EDT

Date 06/14/2023

KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 16106  
215-627-1322  
[bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)  
Attorney for Creditor



Preparation Date:

by:

06/12/23

Melissa S.

**Loan Information:**

Loan Number	
Debtors Name - 1	ANDRE HARRIS
Debtors Name - 2	
Property Address	5912 LANSDOWNE AVE
Property State	PA

**Bankruptcy Information:**

Bankruptcy Case #	19-15608
Filing Date:	9/10/2019
Person filing:	M1
Number of previous filings:	1

**Post petition due**

Post petition due date:	01/01/23
Post petition \$\$\$ due:	\$2,762.51
Post petition insurance:	\$0.00
Post petition taxes:	\$0.00
Total Post petition due	\$2,762.51

**Comment**

Post-petition taxes and insurance included in annual escrow analysis and added to monthly payments.

**Post-Petition Payment History Detail**

Date Pmt Rcvd	Post Due Dt	System PMT	Filed PMT	\$ Received	Comments
10/15/2019	10/01/19	\$472.55	\$472.55	\$472.55	
11/18/2019	11/01/19	\$472.55	\$472.55	\$491.01	
12/17/2019	partial payment	\$0.00	\$0.00	\$250.00	Partial Payment
12/23/2019	12/01/19	\$472.55	\$472.55	\$240.00	
1/24/2020	01/01/20	\$472.55	\$472.55	\$472.55	
2/28/2020	02/01/20	\$472.55	\$472.55	\$472.55	
5/4/2020	03/01/20	\$472.55	\$472.55	\$472.55	
6/4/2020	04/01/20	\$472.55	\$472.55	\$472.55	
7/1/2020	05/01/20	\$472.55	\$472.55	\$472.55	
7/28/2020	06/01/20	\$472.55	\$472.55	\$472.55	
8/21/2020	07/01/20	\$472.55	\$472.55	\$472.55	
12/16/2020	NSF	-\$472.55	-\$472.55	-\$472.55	NSF/Returned Check
12/29/2020	07/01/20	\$472.55	\$472.55	\$472.55	
1/27/2021	partial payment	\$0.00	\$0.00	\$309.05	Partial Payment
2/2/2021	08/01/20	\$472.55	\$472.55	\$472.55	
2/19/2021	NSF	-\$472.55	-\$472.55	-\$472.55	NSF/Returned Check
2/23/2021	08/01/20	\$472.55	\$472.55	\$309.05	
3/1/2021	09/01/20	\$472.55	\$472.55	\$1,162.07	
3/25/2021	10/01/20	\$472.55	\$472.55	\$472.55	
4/9/2021	10/01/20	\$472.55	\$472.55	\$472.55	
5/10/2021	partial payment	\$0.00	\$0.00	\$310.00	Partial Payment
5/19/2021	02/01/21	\$472.03	\$472.03	\$480.00	
5/24/2021	03/01/21	\$472.03	\$472.03	\$480.00	
6/11/2021	04/01/21	\$472.03	\$472.03	\$480.00	
6/29/2021	NSF	-\$472.03	-\$472.03	-\$480.00	NSF/Returned Check
7/7/2021	04/01/21	\$472.03	\$472.03	\$480.00	
8/30/2021	NSF	-\$472.03	-\$472.03	-\$480.00	NSF/Returned Check
9/24/2021	04/01/21	\$472.03	\$472.03	\$480.00	
9/30/2021	05/01/21	\$472.03	\$472.03	\$480.00	
11/22/2021	NSF	-\$472.03	-\$472.03	-\$480.00	NSF/Returned Check
11/29/2021	08/01/21	\$472.03	\$472.03	\$480.00	
12/31/2021	09/01/21	\$472.03	\$472.03	\$480.00	
1/28/2022	10/01/21	\$473.41	\$473.41	\$480.00	
2/22/2022	11/01/21	\$473.41	\$473.41	\$480.00	
3/23/2022	12/01/21	\$473.41	\$473.41	\$480.00	
5/2/2022	01/01/22	\$473.41	\$473.41	\$0.00	
5/31/2022	02/01/22	\$473.41	\$473.41	\$500.00	
6/27/2022	03/01/22	\$473.41	\$473.41	\$480.00	
7/29/2022	04/01/22	\$473.41	\$473.41	\$480.00	
9/9/2022	05/01/22	\$473.41	\$473.41	\$480.00	
10/31/2022	06/01/22	\$473.41	\$473.41	\$480.00	
12/5/2022	07/01/22	\$475.00	\$475.00	\$480.00	
2/1/2023	08/01/22	\$475.00	\$475.00	\$480.00	
3/6/2023	09/01/22	\$475.00	\$475.00	\$480.00	
4/21/2023	10/01/22	\$475.00	\$475.00	\$480.00	
Due	11/01/22	\$475.00	\$475.00	\$0.00	
Due	12/01/22	\$475.00	\$475.00	\$0.00	
Due	01/01/23	\$475.00	\$475.00	\$0.00	
Due	02/01/23	\$475.00	\$475.00	\$0.00	
Due	03/01/23	\$475.00	\$475.00	\$0.00	
Due	04/01/23	\$475.00	\$475.00	\$0.00	
Due	05/01/23	\$475.00	\$475.00	\$0.00	
Due	06/01/23	\$485.16	\$485.16	\$0.00	

Total Due	\$21,304.74	\$21,304.74	
Total Received			\$18,542.23

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT PENNSYLVANIA DISTRICT OF  
PENNSYLVANIA**

**IN RE: Andre Harris**

**Debtor(s)**

**U.S. Bank N.A., as trustee, on behalf of  
the holders, of the J.P. Morgan Mortgage  
Acquisition Trust 2006-WMC4 Asset  
Backed Pass-Through Certificates, Series  
2006-WMC4**

**Movant**

**vs.**

**Andre Harris**

**Debtor(s)**

**Kenneth E. West**

**Trustee**

**BK NO. 19-15608 MDC**

**Chapter 13**

**Related to Claim No. 7-2**

**CERTIFICATE OF SERVICE**

**RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Mark A. Cronin of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on June 14, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below;

Debtor(s)

Andre Harris  
5912 Lansdowne Avenue  
Philadelphia, PA 19151

Attorney for Debtor(s) (via ECF)

David M. Offen, Esq.  
601 Walnut Street  
Suite 160 West  
Philadelphia, PA 19106

Trustee (via ECF)

Kenneth E. West Esq.  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

Method of Service: electronic means or first-class mail.

Dated: June 14, 2023

/s/ Mark A. Cronin

Mark A. Cronin Esquire  
Attorney I.D. 58240  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
215-627-1322  
mcronin@kmlawgroup.com